

PHILLIP A. TALBERT
United States Attorney
DAVID W. SPENCER
Assistant United States Attorney
501 I Street, Suite 10-100
Sacramento, CA 95814
Telephone: (916) 554-2700
Facsimile: (916) 554-2900

Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

MIGUEL CAMARGO, JR.,

Defendant.

CASE NO. 2:23-CR-111-DC

STIPULATION REGARDING EXCLUDABLE
TIME PERIODS UNDER SPEEDY TRIAL ACT;
[PROPOSED] FINDINGS AND ORDER

DATE: December 20, 2024
TIME: 9:30 a.m.
COURT: Hon. Dena M. Coggins

STIPULATION

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. By previous order, this matter was set for status on December 19, 2024, before the Honorable Daniel J. Calabretta, and time was excluded through that date, under Local Code T4.
2. On October 8, 2024, this case was reassigned to the Honorable Dena M. Coggins, all previously scheduled court dates were vacated, and the parties were directed to file a request to reset the matter on an available date on Judge Coggins's criminal calendar. *See* ECF 40 (minute order).
3. By this stipulation, the parties request to reset the status conference for December 20, 2024, and to exclude time between October 8, 2024, and December 20, 2024, under Local Code T4.
4. The parties agree and stipulate, and request that the Court find the following:

1 a) The government has represented that the discovery associated with this case
2 includes approximately 4,761 pages of law enforcement reports, search warrant materials,
3 financial records, and other evidence, including audio and video recordings, as well as the
4 voluminous downloaded contents of two seized cell phones. All of this discovery has been either
5 produced directly to counsel and/or made available for inspection and copying.

6 b) Counsel for defendant desires additional time to review this discovery, conduct
7 defense investigation, confer with her client regarding his options for responding to the charges,
8 and otherwise prepare for trial.

9 c) Counsel for defendant believes that failure to grant the above-requested
10 continuance to December 20, 2024, would deny him the reasonable time necessary for effective
11 preparation, taking into account the exercise of due diligence.

12 d) The government does not object to the continuance.

13 e) Based on the above-stated findings, the ends of justice served by continuing the
14 case as requested outweigh the interest of the public and the defendant in a trial within the
15 original date prescribed by the Speedy Trial Act.

16 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
17 et seq., within which trial must commence, the time period of October 8, 2024 to December 20,
18 2024, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code
19 T4] because it results from a continuance granted by the Court at defendant's request on the basis
20 of the Court's finding that the ends of justice served by taking such action outweigh the best
21 interest of the public and the defendant in a speedy trial.

22 5. Nothing in this stipulation and order shall preclude a finding that other provisions of the
23 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial
24 must commence.

25 IT IS SO STIPULATED.
26
27
28

1 Dated: October 8, 2024

PHILLIP A. TALBERT
United States Attorney


2
3 /s/ DAVID W. SPENCER
DAVID W. SPENCER
Assistant United States Attorney

4
5
6 Dated: October 8, 2024

/s/ CLEMENTE JIMENEZ
CLEMENTE JIMENEZ
Counsel for Defendant
MIGUEL CAMARGO, JR.

7
8
9
10
11 IT IS SO ORDERED.

12 Dated: October 9, 2024


Dena Coggins
United States District Judge